

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	
)	
Craydeen Townsend, Jr._)	Case No.: 20-23498-CMB
Debtor(s))	Chapter 13
)	
PNC Bank, N.A.)	
Creditor)	
)	
v.)	Related to Document No. ____
)	
Craydeen Townsend, Jr.)	
Debtor)	
)	
Ronda J. Winnecour,)	
Chapter 13 Trustee)	
)	
Additional)	
Respondent)	

DECLARATION REGARDING MONTHLY PAYMENT CHANGE

AND NOW, comes the Debtor(s), Craydeen Townsend, Jr., by and through his/her/their attorney, Douglas G. Hipp, Esquire, and files the within Declaration Regarding Monthly Payment Change and in support thereof respectfully represents as follows:

1. The Debtors is Craydeen Townsend, Jr. .
2. Counsel for the Debtors is Douglas G. Hipp, Esquire of Hipp/Kaiser-Hipp.
3. The mortgage company of the Debtors is the PNC Bank, N.A..
4. The new proposed monthly payment payable to PNC Bank, N.A. is \$89.58 effective June 15, 2021 per the Notice of Mortgage Payment Change Filed May 20, 2021.
5. Debtor's counsel has reviewed the existing plan, recomputed the plan payment and finds that the existing plan payment is sufficient to pay the modified mortgage payment as set forth in the notice.

Respectfully submitted,

May 21, 2021
Date

/s/Douglas G. Hipp
Douglas G. Hipp, Esquire
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